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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **SEATTLE DIVISION**

10 AMA MULTIMEDIA, LLC, a Nevada limited
11 liability company

12 Plaintiff,

13 vs.

14 SPANKBANG.COM; NIVUN PTE LTD, a
15 foreign corporation, individually and d/b/a
16 SPANKBANG.COM; and John Does 1-20,
17 Defendants.

18 **Case No.: 2:16-cv-00435-RAJ**

19 **DECLARATION OF SPENCER
20 FREEMAN IN SUPPORT OF
21 PLAINTIFF'S EX PARTE MOTION
22 FOR EARLY DISCOVERY**

23 **NOTE ON MOTION CALENDAR:
24 April 14, 2016**

25 I, Spencer Freeman, under penalty of perjury, declare and state as follows:

26 1. I am an attorney at law licensed to practice before the Courts of the State of
Washington, the United States District Court Western District of Washington, Eastern District of
Washington, Ninth Circuit Court of Appeals, and United States Supreme Court. I am the
principle attorney with the Freeman Law Firm, Inc., attorneys for Plaintiff AMA Multimedia,
LLC. Unless otherwise stated, I have personal knowledge of the facts contained herein this
declaration and, if called and sworn as a witness, could and would competently testify thereto.

27 2. I sent emails to the following vendors for spankbang.com: Whoisguard, Inc.,
Enom, Inc., Rightside Operating Co., Traffic Haus, and Namecheap, Inc.. I inquired with each

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35 **FREEMAN LAW FIRM, INC.**
36 1107 ½ Tacoma Avenue South
37 Tacoma, WA 98042
38 (253) 383-4500 - (253) 383-4501 (fax)

whether they would honor my request for information without a subpoena. None of the vendors have responded.

3. In the past, during other litigation, I have personally verified that Enom, Inc., Rightside Operating Co., and Namecheap, Inc. will not provide, release, or disclose any client information without a subpoena.

4. I have a contact with the legal department of Cloudflare, Inc., who has responded to previous subpoenas for me and requests for information. Cloudflare, Inc. has made clear that they will not release any information regarding clients or accounts without a subpoena.

5. I deposed Constantin Luchian, owner of Incorporate Now, Inc., in *Hydendra v. Luchian, et al.*, Cause No. 1:15-cv-22134-UU, United States District Court Southern District of Florida. Incorporate Now, Inc. provides services as a DMCA registered agent for numerous companies operating Internet web sites. Mr. Luchian made absolutely clear that he would not provide any information regarding any of his clients without a Court Order or subpoena.

I declare under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Execute on the 14th day of April, 2016 at Tacoma, Washington.

/s/ Spencer D. Freeman
Spencer Freeman

**DECLARATION OF SPENCER FREEMAN IN
SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION FOR
EARLY DISCOVERY**

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